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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**In re:**

**Case No. 06-42336 WJL**

**KENNETH EDWARD MURNEY and  
VIRGINIA ANN MURNEY,**

**Chapter 13**

**MOTION TO MODIFY CHAPTER 13 PLAN**

**Debtors.**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Debtors' plan shall be deemed completed and debtors shall receive a discharge; however debtors shall waive the discharge of any unpaid balance of the priority claim of the State Board of Equalization. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:  
Mr. Murney intends to make arrangements with the State Board of Equalization regarding the remaining priority debt.

Dated: March 27, 2012

/s/ Patrick L. Forte  
PATRICK L. FORTE  
Attorney for Debtors